

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

ROBERT DAVID STEELE)

et al)

Plaintiffs,)

v.)

Case 3:17-cv-601-MHL

JASON GOODMAN)

et al)

Defendants.)

PLAINTIFFS' LIST OF PROPOSED EXHIBITS

Plaintiffs, Robert David Steele and Earth Intelligence Network (“Plaintiffs”), by counsel, pursuant to General Order No. 2020-7 and pursuant to Paragraph 32 of the Initial Pretrial Order [*ECF No. 157 (“IPO”)*] and the Court’s Order entered on January 29, 2020 [*ECF No. 175*], submit the following List of Proposed Exhibits intended to be offered in evidence at the trial of this action currently scheduled to begin on May 5, 2020:

Plaintiffs, by counsel, intend to offer in evidence and use the following Exhibits at trial:

<i>Tab</i>	<i>BRIEF DESCRIPTION OF EXHIBIT</i>
1	Robert David Steele – Experience https://robertdavidsteele.com/about/history/
2	Earth Intelligence Network https://phibetaiota.net/about/ https://earth-intelligence.org/

Tab	BRIEF DESCRIPTION OF EXHIBIT
3	#UNRIG – https://unrig.net/150-2/
4	#UNRIG Budget Report – https://unrig.net/budget-report/
5	International Tribunal for Natural Justice – https://www.itnj.org/itnj/
6	Cynthia's Story – https://www.allthingscynthiamckinney.com/
7	OSS.Net Library
8	NATO Open Source Intelligence Handbook
9	NATO Past Performance Reference
10	Nomination for the Nobel Peace Prize
11	#UNRIG Trademark Application
12	#UNRIG Manifesto https://unrig.net/manifesto/
13	Goodman Founding Citizen Certificate
14	EIN 2017 Schedule O Photograph
15	Earth Intelligence Network Launches #UNRIG Recruitment Drive – Advisory
16	Earth Intelligence Network – Income 2017
17	Earth Intelligence Network – Income 2018
18	Earth Intelligence Network – Income 2019
19	Total Donations All Sources – 06/13/2017

<i>Tab</i>	<i>BRIEF DESCRIPTION OF EXHIBIT</i>
20	<p>“Clear and Present Danger (Calm Before the Storm?) #maerskmemphis”. https://www.youtube.com/watch?v=ekr5cw2WAbU</p> <p>* Specific Parts Of This YouTube Video – cited in Plaintiffs’ Amended complaint – Will Be Played To The Jury</p>
21	<p>List of YouTube Videos At Issue In Amended Complaint</p> <p>* Specific Parts Of These YouTube Videos – cited in Plaintiffs’ Amended complaint – Will Be Played To The Jury</p>
22	<p>List of YouTube Videos – Identifying Lutzke As “Queen Tut”</p> <p>* Specific Parts Of These YouTube Videos – cited in Plaintiffs’ Amended complaint – Will Be Played To The Jury</p>
23	Steele 10/16/17 Email – Request to Disable Comments
24	Screenshots Of YouTube Videos – Featuring Goodman, Negron, Lutzke and Others Together On Camera
25	Screenshots of YouTube Videos – Featuring Memes Employed, Such As Goodman/Bacon, Goodman/Squidward, What Big Eyes You Have, Burning RV
26	Screenshots of YouTube Videos – Featuring CSTT Merchandise Using Plaintiff Steele’s Picture
27	Tweets Published By Goodman
28	Goodman Facebook Posts and Comments On Videos
29	Email from Goodman to CSTT Community – 06/27/2017, Received by L. Lawrence
30	Goodman Email to McKinney – 08/11/2017
31	Goodman Email to David Seaman – 01/24/2018

Tab	BRIEF DESCRIPTION OF EXHIBIT
32	Third Party Emails – Cynthia McKinney, Berto Jongman Angie Blake (Victurus Libertas), Christine Marais, Margaret Douglas, L. Lawrence
33	RDS Timeline
34	Queen Tut Comment – Featured In 12/27/2017 “Hoax Wars” Video https://www.bitchute.com/video/Rp7qjILuIHga/
35	Screenshots of YouTube Videos – Featuring Goodman Review of Plaintiff’s Websites, Tax Returns And Other Information
36	Additional YouTube Videos * Specific Parts Of These YouTube Videos – cited in Plaintiffs’ Amended complaint – Will Be Played To The Jury
37	Goodman Admissions * Goodman failed to respond to Plaintiff’s request for admissions served on August 1, 2019. Under Rule 36(a)(3) of the Federal Rules of Civil Procedure, the matters are admitted

A copy of Plaintiffs’ proposed exhibits was emailed to Defendant Goodman in PDF via HighTail.

DATED: March 30, 2020

ROBERT DAVID STEELE
EARTH INTELLIGENCE NETWORK

By: /s/ Steven S. Biss
Steven S. Biss (VSB # 32972)
300 West Main Street, Suite 102
Charlottesville, Virginia 22903
Telephone: (804) 501-8272
Facsimile: (202) 318-4098
Email: stevenbiss@earthlink.net

Counsel for the Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2020 a copy of the foregoing was filed electronically using the Court's CM/ECF system, which will send notice of electronic filing to counsel of record and all interested parties receiving notices via CM/ECF, and a copy was emailed in PDF to Defendants, Goodman and Lutzke.

By: /s/ Steven S. Biss
Steven S. Biss (VSB # 32972)
300 West Main Street, Suite 102
Charlottesville, Virginia 22903
Telephone: (804) 501-8272
Facsimile: (202) 318-4098
Email: stevenbiss@earthlink.net

Counsel for the Plaintiffs